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March 15, 2021

Robert S. Fairweather Acting Director Office of Management and Budget 1650 Pennsylvania Ave NW Washington, DC 20504

Re: Recommendations From the Metropolitan and Micropolitan Statistical Area Standards Review Committee to the Office of Management and Budget Concerning Changes to the 2010 Standards for Delineating Metropolitan and Micropolitan Statistical Areas [Docket ID No. OMB-2021-0001]

Dear Acting Director Fairweather:

I write today in response to the Office of Management and Budget's (OMB) proposed changes to the thresholds for determining metropolitan statistical areas. I am concerned this proposal will harm some communities in states like Montana by placing all small towns into one category and disrupting the flow of resources for vital initiatives like housing and healthcare assistance. I strongly believe now is not the time to change the rules of the road for our nation's small communities as they continue to grapple with the effects of the COVID-19 pandemic. That's why I oppose increasing the Metropolitan Statistical Area (MSA) from a minimum population of 50,000 to 100,000.

The MSA designation is used by various federal agencies to distribute aid and collect data. Doubling the threshold of MSA criteria to 100,000 would disrupt funding flows for 144 mid-sized cities including Great Falls, Missoula and potentially Bozeman in Montana. The MSA designation is a critical tool to help determine what resource cities need to better serve their communities.

Cities across the country rely on MSA status to determine funding for several federal initiatives. However, every federal agency has its own federal funding formula, which may or may not use the MSA designation in some capacity. At this time, it is unclear what the full scope of the MSA designation has on our cities' funding eligibly. Given the chaos and instability communities have faced the last year due to the COVID-19 pandemic, it would be irresponsible of OMB to make such a drastic change without knowing the full effect.

Maintaining consistency in the MSA status will help local governments and businesses bounce back from the economic crisis caused by the Covid-19 pandemic. Please do not move forward with this proposal.

Sincerely,

Jon Tester